

US Patent Application Serial No. 10/083,175

**Remarks*****Entry of Amendment Pursuant to 37 C.F.R. § 1.116***

The Applicant respectfully requests entry of the accompanying amendment. Entry is deemed proper under 37 C.F.R. § 1.116 because the amendments to the claims merely clarifies that the term "external" as previously discussed in the prosecution history to date means "outside" the electronic device. Since this has been argued at length in the prosecution history, the Applicant submits that a new search is not necessary and respectfully requests that the amendment be entered.

***Status of Claims***

Claims 1-20 are pending in the application and are presented for reconsideration. Claims 1, 8-10, 17, and 19-20 have been amended. Claims 2-7, 11-16 and 18 remain in the application unchanged. No new matter has been added.

***Claim Rejections***

Claims 1-16, 19 and 20 are rejected under 35 U.S.C. § 102(b) as being anticipated by Jacobowitz et al. (U.S. Pat. No. 5,304,969).

Claims 17-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Jacobowitz et al. in view of Bossard et al. (U.S. Pat. No. 4,805,979).

The Examiner's rejections of the claims are respectfully traversed.

***Response to Rejections of Claims******a. Claims 1-7***

Applicant's amended Claim 1 recites:

A cable routing tray for routing external cabling of an electronic device, comprising:  
a body mounted on an outside surface of the electronic device;  
a cable routing channel formed on said body, said cable routing channel comprising an ingress for receiving an external cable from a first outside face of the electronic device, an egress for outputting said external cable to a second outside face of the electronic device, and a guiding path therebetween for removably routing said external cable between said ingress and said egress.

US Patent Application Serial No. 10/083,175

***The Jacobowitz Reference***

The Examiner cites Jacobowitz as anticipating claim 1.

The Examiner seeks to equate the coaxial cable guide channel (169) of Jacobowitz's TCM (10) with Applicant's recited "cable routing channel". In order for this equivalence to stand, however, Jacobowitz's coaxial cable guide channel 169 must therefore also have "an ingress for receiving an external cable *from a first outside face of the electronic device*, an egress for outputting said external cable *to a second outside face of the electronic device*, and a guiding path therebetween for *removably* routing said external cable between said ingress and said egress". However, when the TCM (10) is assembled, clearly only one end of the coaxial cable is outside the TCM (10). The other end of the coaxial cable (23) is connected internally to a connection site (150) on the substrate. This connection is fluid-sealed (see Jacobowitz, col. 9, lines 1-5), meaning that the second end of the cable (23) is clearly not *outside* the TCM (10). Thus, since Jacobowitz does not teach the second end of the coaxial cable *outside* the TCM (10), Jacobowitz does not teach *both* "an ingress for receiving an external cable from a first *outside* face of the electronic device" *and* "an egress for outputting said external cable to a second *outside* face of the electronic device".

In addition, Jacobowitz's coaxial cable guide channel (169) does not teach the limitation "a guiding path therebetween for removably routing said external cable between said ingress and said egress". As stated above, when the TCM (10) is assembled, the coaxial cable inside the guide channel (169) is fluid-sealed (see Jacobowitz, col. 9, lines 1-5). As shown in Jacobowitz, FIG. 6, once the TCM 10 is assembled, the cable (23) is soldered to the connection site (150) on the substrate (40), and therefore is *permanently* sealed within the TCM 10. (See Jacobowitz, col. 9, lines 18-21). Accordingly, the channel 169 does not allow "removably routing said external cable between said ingress and said egress".

Under 35 U.S.C. § 102, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros., Inc. v. Union Oil*

Docket No. 10010753-1  
JJC 4050-019

US Patent Application Serial No. 10/083,175

Co., 814 F.2d 628 (Fed. Cir.), *cert. denied*, 484 U.S. 827 (1987). Since Jacobowitz does not meet each and every limitation of Applicant's claim 1, per *Verdegaal Bros., Inc., supra*, Jacobowitz cannot be used in formulating an anticipation rejection under 35 U.S.C. § 102.

***The Bossard Reference***

Bossard discloses a fiber optic splice closure for protecting the splice made into a transmission cable. Bossard does not make up for the deficiencies of Jacobowitz in meeting Applicant's Claim 1. In particular, Bossard also does not teach "a cable routing channel formed on said body, said cable routing channel comprising an ingress for receiving an external cable from a first outside face of the electronic device, an egress for outputting said external cable to a second outside face of the electronic device, and a guiding path therebetween for removably routing said external cable between said ingress and said egress". In Bossard, the channel is formed by mating the base 16 and cover 17. The channel is therefore formed within the base 16 and cover 17 when assembled and not "on said body" as required by Applicant's claim 1. Further, when the closure assembly 15 is assembled, the channel formed between the base 16 and cover 17 cannot be equated with "a guiding path therebetween for removably routing said external cable between said ingress and said egress" since the fiber optic cables cannot be removed without disassembling the closure assembly 15. In addition, the fiber optic splice closure is not mounted on an electronic device, and therefore does not teach or suggest any outside face of an electronic device. Accordingly, Jacobowitz even in combination with Bossard does not meet the limitations of Applicant's claim 1.

***The Gretz Reference***

Gretz discloses a cable support which provides a curved surface over which the cabling is laid and provides means to permit separation of individual cables to inhibit their shifting within the support. Gretz does not make up for the deficiencies of Jacobowitz and Bossard in meeting Applicant's Claim 1. In particular, Gretz also does not teach "a cable routing channel formed on said body, said cable routing channel comprising an ingress for receiving an

Docket No. 10010753-1  
JJC 4050-019

US Patent Application Serial No. 10/083,175

external cable from a first outside face of the electronic device, an egress for outputting said external cable to a second outside face of the electronic device, and a guiding path therebetween for removably routing said external cable between said ingress and said egress". In Gretz, cables are laid over a curved surface to support the cables. The cable support does not include an ingress, an egress, or a guiding path therebetween for routing the cables. In addition, the cable support is not mounted on an electronic device, and therefore does not teach or suggest any outside face of an electronic device. Accordingly, Jacobowitz even in combination with Bossard and/or Gretz, does not meet the limitations of Applicant's claim 1.

***The Norris Reference***

Norris discloses a cable tray in which cables are hung on hangers. Norris does not make up for the deficiencies of Jacobowitz and/or Bossard and/or Gretz in meeting Applicant's Claim 1. In particular, Gretz also does not teach "a cable routing channel formed on said body, said cable routing channel comprising an ingress for receiving an external cable from a first outside face of the electronic device, an egress for outputting said external cable to a second outside face of the electronic device, and a guiding path therebetween for removably routing said external cable between said ingress and said egress". In addition, the cable tray is not mounted on an electronic device, and therefore does not teach or suggest any outside face of an electronic device. Accordingly, Jacobowitz even in combination with Bossard, Gretz, and/or Norris does not meet the limitations of Applicant's claim 1.

Accordingly, Applicant respectfully submits that none of the prior art of record teaches the invention as claimed in Applicant's Claim 1. Accordingly, the 35 U.S.C. § 102 rejection of claim 1 should be withdrawn and that claim 1 is now in position for allowance.

Claims 2-7 each depend from independent base claim 1 and add further limitations. For at least the same reasons that Claim 1 is not shown, taught, or disclosed by the cited references, Claims 2-7 are likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of claims 2-7 should be withdrawn.

Docket No. 10010753-1  
JJG 4050-019

US Patent Application Serial No. 10/083,175

**b. Claims 8-18**

Amended claim 8 now recites:

An electronic instrument comprising:  
a housing;  
an electrical connector positioned on a first outside face of said housing;  
a first cable routing channel formed on a second outside face of said housing, said second outside face adjacent to said first outside face of said housing, said cable routing channel comprising:  
an ingress in proximity to said electrical connector for receiving an external cable,  
an egress in proximity to a third outside face of said housing for outputting said external cable, and  
a guiding path connecting said ingress and said egress for removably routing said external cable between said ingress and said egress.

Claim 8 recites similar limitations to claim 1, including "a first cable routing channel formed on a second *outside face of said housing*, said second outside face adjacent to said *first outside face of said housing*, said cable routing channel comprising: an ingress in proximity to said electrical connector for receiving an external cable, an egress in proximity to a *third outside face of said housing for outputting said external cable*, and a guiding path connecting said ingress and said egress for removably routing said external cable between said ingress and said egress. " For at least the same reasons that Claim 1 is not shown, taught, or disclosed by the cited references, Claim 8 is likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of Claim 8 should be withdrawn.

Claims 9-18 each depend from independent base claim 8 and add further limitations. For at least the same reasons that Claim 8 is not shown, taught, or disclosed by the cited references, Claims 9-18 are likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of claims 9-18 should be withdrawn.

**c. Claims 19-20**

Amended claim 19 now recites:

A method for routing an external cable attached to an electronic

US Patent Application Serial No. 10/083,175

connector mounted on a first outside face of an electronic instrument to a second outside face of said electronic instrument, comprising:  
providing on said instrument a routing channel from said first outside face of said electronic instrument to said second outside face of said electronic instrument, said routing channel comprising an ingress in proximity to said electrical connector for receiving said external cable, an egress in proximity to a third outside face of said housing for outputting said external cable, and a guiding path therebetween for removably routing said external cable between said ingress and said egress.

Claim 19 recites similar limitations to claim 1, including "providing on said instrument a routing channel from said first outside face of said electronic instrument to said second outside face of said electronic instrument, said routing channel comprising an ingress in proximity to said electrical connector for receiving said external cable, an egress in proximity to a third outside face of said housing for outputting said external cable, and a guiding path therebetween for removably routing said external cable between said ingress and said egress." For at least the same reasons that Claim 1 is not shown, taught, or disclosed by the cited references, Claim 19 is likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of Claim 19 should be withdrawn.

Claim 20 depends from independent base claim 19 and adds further limitations. For at least the same reasons that Claim 19 is not shown, taught, or disclosed by the cited references, Claim 20 is likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of Claim 20 should be withdrawn.

US Patent Application Serial No. 10/083,175

**Conclusion**

In view of the foregoing remarks, it is respectfully submitted that none of the references cited by the Examiner taken alone or in any combination shows, teaches, or discloses the claimed invention, and that Claims 1-20 are in condition for allowance. Reexamination and reconsideration are respectfully requested.

Should the Examiner have any questions regarding this amendment, or should the Examiner believe that it would further prosecution of this application, the Examiner is invited to call the undersigned.

Respectfully submitted,



June 5, 2006

Jessica Costa, Reg. No. 41,065

The Law Offices of Jessica Costa, PC  
P.O. Box 460 Crozet, VA  
22932-0460  
(434) 823-2232  
(434) 823-2242 (fax)